

Hon. Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SCOTT MILLER, an individual, MICHAEL
SPAULDING, an individual,

Plaintiffs,

v.

KSHAMA SAWANT, an individual, CITY
OF SEATTLE, a municipal corporation,

Defendants.

Case No. 2:18-cv-00506-MJP

**DECLARATION OF DMITRI IGLITZIN
IN SUPPORT OF DEFENDANT KSHAMA
SAWANT'S MOTION FOR LEAVE TO
FILE OVER-LENGTH BRIEF**

I, Dmitri Iglitzin, hereby declare as follows:

1. I am a partner at the firm of Barnard Iglitzin & Lavitt LLP, and one of the counsel of record for Defendant Kshama Sawant in this matter.

2. I am aware that the Court looks upon motions for over-length briefs with disfavor. To the best of my recollection, in over 35 years of practicing law, I do not recall another occasion on which I have requested leave to file an over-length brief.

3. Despite the diligent efforts of four different attorneys, we have been unable to reduce Defendant Sawant's motion for summary judgment to 24 pages.

4. There is substantial need to allow the over-length brief because the relevant facts and arguments cannot be effectively presented to the Court in 24 pages, as the Local Rules would otherwise require.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing statements are true and correct.

3 RESPECTFULLY SUBMITTED this 4th day of January, 2022.

4
5 s/Dmitri Iglitzin

6 Dmitri Iglitzin, WSBA No. 17673
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